

Planning Policy and Economic Development
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire SP10 3AJ

Our ref: 3747

28 March 2024

Dear Sir/ Madam

Draft Local Plan 2050: Regulation 18 (Stage 2) Consultation and Call for Sites

We submit these representations on behalf of Simon Prior-Palmer, of Appleshaw House Farm.

Spatial Strategy and Housing Requirement in the Rural Area

Policy SS4 (Rural Housing Requirement), Table 3.3 (Housing Requirement and Supply), Policy SS5 (Neighbourhood Development plan Housing Requirements)

1. The plan period (2020-2040) needs to be extended to at least 2041 and additional housing supply identified to meet this.

The Regulation 18 (Stage 2) plan sets out a vision and strategy for the borough up to 2040. The Local Development Scheme (LDS), last updated in November 2023, sets out the proposed timetable for progression of the plan towards adoption. This would see the regulation 19 consultation conducted in Q1 of 2025, submission in Q2, examination in Q3 and adoption by Q2 of 2026. Paragraph 22 of the National Planning Policy Framework ("NPPF") makes clear that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Larger scale developments should look further ahead, at least 30 years. The Housing Trajectory which has been produced (Jan 2024) only sets out a trajectory up until 2039/40 and needs to be extended to at least 2041 (assuming adoption in 2026) and potential longer as the LDS programme could well see some slippage should the examination process take longer than anticipated. The local housing need of 550/year over the plan period 2020-2040 (a total of 11,000), should be increase by at least 500, to account for an additional year in the plan period (2041).

2. The housing requirement in the rural area should be increased and the purported supply needs to be shown to be deliverable.

Policy SS4 sets out a rural housing requirement for Northern and Southern Test Valley (542), which is 5% of the overall housing requirement in the borough. This should be increased to cover an



additional year in the plan period, to 2041. In addition, we submit that it should be further raised to address housing affordability issues in the rural area and to allow for rural villages to grow and thrive.

A significant portion of the borough is classified as rural, and the Strategic Housing Market Assessment (SHMA) 2022 makes clear that the rural area has contributed significantly to housing completions over the current Local Plan period. Housing affordability is a particular problem in the rural area, and we submit that the Local Plan 2040 needs to make greater provision for delivery of housing in the rural area to address this.

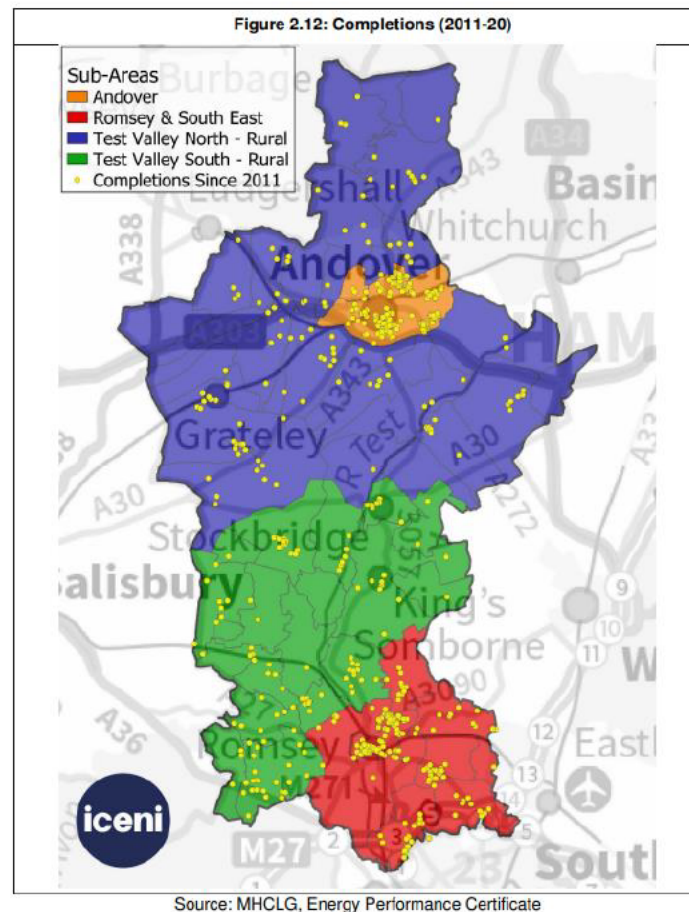


Figure 1 Extract of Test Valley SHMA 2022 identifying parts of the borough which are “rural” (Blue and Green) and housing completions in these areas

it must be shown that the 492 housing completions and commitments relied on for housing supply in the rural area are deliverable within the NPPF definition. The Council is relying upon sites with planning permission, allocated sites and ‘identified capacity sites’ as part of its deliverable supply. The NPPF makes clear that in order to be considered ‘deliverable’, there must be clear evidence that completions could begin on these sites within 5 years. No such evidence has been set out, and this must be rigorously tested at examination. 492 sites is 90% of the rural requirement over the full plan period – it is imperative that this element of supply is shown to be deliverable

3. Rural Housing Supply via Neighbourhood Plans must also be shown to be deliverable: a review mechanism does not go far enough to ensure supply.



Paragraph 3.73 of the Regulation 18 Local Plan confirms that in the rural area, sites will not be allocated in the Local Plan 2040, and instead this housing need will be delivered by 'locally driven schemes'.

The strategy for housing in rural areas relies, in part, upon housing coming forward via Neighbourhood Development Plans (Policy SS5) (110 dwellings – 70 in Southern Test Valley and 40 in Northern Test Valley). Whilst the benefits of community led planning are noted, this does leave uncertainty as to whether or not the housing requirement will in fact be delivered, given that community led planning is not mandatory, and is a significant burden for local communities; whilst grant funding is available, this is very limited in relation to the local consultancy costs and as such, communities bringing forward Neighbourhood Plans rely heavily on voluntary efforts. There is a risk that the rural housing anticipated to come forward via Neighbourhood Plans will either take significant time, or not come forward; which could have implications for the housing trajectory, and for the soundness of the overall strategy and plan at examination. Paragraph 3.79 of the Regulation 18 plan recognises this uncertainty, in stating that the Council will monitor delivery of the rural housing requirement, and undertake a plan review if this is not forthcoming, five years after adoption. Any such review and additional allocations (via a Development Plan Document) would take further time and would result in under delivery in the rural area for a significant period of time.

The strategy should be amended to ensure delivery of rural housing, to address affordability issues and allow rural villages to grow and thrive as is required by the NPPF. The Council should proactively allocate sites in rural communities, or ensure that amended settlement boundaries make provision for some limited growth within rural settlements. The NPPF is clear that planning policies should support housing that reflects local needs; and "identify opportunities for villages to grow and thrive, especially where this will support local services." (NPPF para 83). At present, the plan as drafted does not go far enough to ensure rural villages (particularly those which are proposed to be placed in Tier 4) can grow and thrive.

Settlement Hierarchy – Policy SS1

4. In general, our client supports the approach of ranking settlements based on their sustainability and directing the majority of development towards more sustainable settlements with more facilities and services. This does, however, need to be supplemented with small scale growth in the rural area.
5. Appleshaw is identified as being in Tier 3 of the settlement hierarchy, based on its services and facilities. Policy SS1 would allow for windfall development, along with the other types of development contemplated in the policy. This is supported; however, Tier 3 locations should also be the subject of small scale housing allocations to allow for planned growth in these more sustainable rural locations. Our client owns land in Appleshaw which is suitable for development and we submit this for inclusion in the Call for Sites. A map is provided in the appendix to this letter.
6. The analysis of facilities and services, and Rural Facilities Survey was undertaken in 2021. By the point of adoption of the Local Plan, in 2026 (at the earliest) this will be over 5 years old. As is recognised by the Council, rural services and facilities change with time. Future provision of bus services is uncertain and therefore the Council accepts they should not rely on this in deciding where to focus rural growth. Likewise, access to local shops can equally change with time – which the methodology fails to recognise. The Government's change to permitted development rights, allowing change of use from Class E to C3 (via Class MA of the GPDO) has resulted in significant numbers of conversions in recent years. These rights have just been further relaxed, in March 2024, so there is even greater risk



that local commercial services and facilities in the rural area will be lost. As such, the approach to growth in rural areas should not rely so rigidly on presence of four key facilities. Shops can close; as can schools as was seen recently in Hatherden.

7. Alongside the settlement hierarchy analysis, it is important the settlement boundary is appropriately drawn, to ensure that there are small scale opportunities for windfall development in the more sustainable rural settlements, to ensure they can grow and thrive. We address this below.

Settlement Boundary – Appleshaw

8. Our client supports the proposal to amend the settlement boundary at Appleshaw, to include Appleshaw House and Mead House. The Conservation Area Guidance itself identified Appleshaw House and Mead House as “amongst the most distinguished of the larger buildings in the village”, positioned at the southern extent of the historic settlement, extending from Appleshaw House and Mead House north to Redenham. It is appropriate that these two properties be included in the settlement boundary.
9. The recreation ground should stay inside the settlement boundary. There is already strong policy protection in place to prevent open spaces being built on. Paragraph 103 of the NPPF makes clear that “existing open space, sports and recreational buildings and land, including playing fields should not be built on” unless the space is surplus to requirements and replacement facilities are provided. The Conservation Area Guidance for Appleshaw noted that the open areas such as the field “form a vital part of the character of the village” and it is therefore appropriate that they remain inside the boundary. it is also possible to explore Local Green Space designation as a further means of control. The methodology suggests that land is to be taken out of the settlement boundary where the site ‘more closely relates’ to the countryside. Functionally, a sports field (and indeed the allotments) clearly have a closer functional link with the settlement than with the agricultural fields beyond.
10. The methodology suggests the revised boundary is based on “the factual situation of built development on the ground” but this approach has not been consistently followed. The settlement Boundary should be further extended, to accurately reflect the extent of built form at Appleshaw House and Mead House. The manege (riding school) area, to the east of the dwellings at Appleshaw House and Mead House, should also be included in the settlement boundary, to more accurately reflect the extent of built form on the ground. Figure 2 below is a historic aerial photograph (1999, Google Earth) showing the manege has been in place for over 24 years. This is built development on the ground, and the boundary should therefore extend around the eastern, rather than western boundary. In general there appears to be an inconsistent approach to assessment of the character of the site, versus the function of a site, when assessing whether it should be inside or outside the boundary. the methodology should be clearly set out and applied; it is based on the physical character of land, or its functional use? The manege is functionally linked to the dwelling and has a built character rather than open undeveloped character. There is no clear reason why it has been excluded.



Figure 2 Manege at Appleshaw House and Mead House

Call for Sites Submission

Our client owns a parcel of land to the west of Appleshaw, which is hereby submitted for consideration via the Call for Sites. This parcel is identified in yellow below and has an area of 5,815m² (0.58ha) excluding the narrower access area which provides access on to the main road. At a density of 30dph this could deliver 17 dwellings within easy walking/cycling distance of St Peter's CofE Primary School (5 min cycle ride via the PRoW network), St Peter in the Wood Church, The Walnut Tree Public House, the recreation ground, and children's play area. The site is well contained in the landscape, being separated from the agricultural fields to the west by mature hedgerow. A sympathetic development could come forward on the plot without adverse impact on neighbour amenity or the wider landscape. The Active8 bus service, which connects Andover with Ludgershall, Tidworth, Amesbury and Salisbury; there is a bus stop on the A342 Andover Road near the junction with Privet Lane and another at the crossroads to Appleshaw and Fyfield in the other direction. In each case, this would be 20-30 minutes walk from the site. The service commence at 05:45 and runs until 23:05, with services 2-3 services per hour for most of the day; as such, this service could provide convenient access via sustainable modes of transport to employment opportunities in these nearby settlements. Alternatively it would be a 15min cycle road to Ludgershall (avoiding the A342 road) or 20min to Andover.



Figure 3 Land Submitted via Call for Sites

BELL CORNWELL LLP



Associate

